

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

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RACHEL HUBBARD,

Plaintiff,

-against-

**PLAINTIFF'S
PROPOSED VOIR
DIRE QUESTIONS**

NO PARKING TODAY, INC. and
CLAYTON THOMAS,

Index No.:
08CIV 7228(GEL)

Defendants.
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PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

1. It is contended by the plaintiff that she was discriminated against and terminated on account of her refusal to accede to sexual demands and in retaliation for her complaints about discrimination, sexual harassment and hostile work environment. Do you know of any reason that you could not be fair or impartial in such a case?
2. It is contended by the plaintiff that the defendant's proffered or claimed reason for terminating plaintiff - that she spoke inappropriately to her supervisor - is a pretext or false reason. Do you feel comfortable evaluating the honesty of others and deciding, if appropriate that someone has lied to you.
3. Which magazines or newspapers do you regularly or generally read?
4. What are your favorite or often watched television programs? Why?
5. Have you ever served on a jury before? Without talking about that case specifically, did you find the experience generally positive or negative?
6. Do you believe that it should be illegal to make employment decisions on account of someone's sex, their refusal to accede to sexual demands or in retaliation of complaints about discrimination, sexual harassment and hostile work environment? Why?
7. If the plaintiff proved that she was entitled to financial damages is there anything that could prevent you from awarding the plaintiff such damages?

8. It is contended that plaintiff was discriminated against willfully. If plaintiff proved this, and the Court provided it as an option, would you be willing to award punitive damages over and above plaintiff's actual damages in order to punish the defendant?
9. Have you ever been accused of discrimination against anyone? If yes, appropriate follow-up question(s).

Dated: February 15, 2011
New York, NY

Respectfully submitted,

MARK L. LUBELSKY & ASSOCIATES

/s/ Mark Lubelsky

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